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Organization:

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Comments: I am writing as an endangered wildlife species and old growth forests protection advocate because old-growth forests provide trees big enough to contain the large nest cavities pileated woodpeckers need for nesting and an abundance of insects for the birds to feed on. However, I am now very concerned because as the climate changes, old forests that woodpeckers and other wildlife depend on are increasingly threatened with destruction.

Please understand that I extend my sincere appreciation and thank you for proposing a nationwide plan amendment to address the long-term persistence, distribution and recruitment of old-growth forest across national forest systems. This proactive step will help protect the countrys oldest trees. However, please understand that to truly safeguard their vital role in combating the ever worsening climate crisis, I strongly urge you to please make the amendment significantly stronger.

According to the proposed amendment, Vegetation management within old-growth forest conditions may not be for the primary purpose of growing, tending, harvesting, or regeneration of trees for economic reasons. This leaves a significant loophole that would allow old-growth trees to be logged nationwide, undermining the contributions old-growth forests and trees make to climate resiliency and healthy ecosystems.

I am aware that the U.S. Forest Service no longer proposes projects primarily for economic reason because its logging projects are now proposed for environmental conservation goals of old growth forest resilience and reduction in the occurrence of destructive wildfires. I am aware that too often these terms are misused to justify destructive logging and road-building projects. I completely oppose any forest service agency program that would authorize the sale and destruction of our old-growth forest trees.

It is crucial for Secretary Vilsack, to be aware that there is a deficit of old-growth trees and forests on federal lands. They should be left standing so they can store carbon, provide ecological integrity, increase biodiversity, improve watershed health, and enhance wildfire resiliency.

I strongly urge you to please remove all language in the amendment that would allow old-growth trees and forests to be logged other than in *very rare* circumstances of imminent risk to public safety.

At this time, I thank you for your consideration of my letter and my recommendations. I strongly urge you to please use this opportunity to formalize a commitment to protect our old growth mature trees because if these are allowed to grow, they will become the old growth of tomorrow.

Sincerely,

Jean Marie Naples, MD-Ph.D.